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June 9, 2005

Nadine Pellegrini
Assistant U.S. Attorney
Moakley U.S. Courthouse
Boston, MA 02210

Re: **United States v. Gregory Wright**
No. 05-CR-10001-WGY

Dear Nadine:

In preparation for the suppression hearing tomorrow, I am writing to request the disclosure of exculpatory information. In particular, I request notification of:

- a. Any statement or a description of such a statement, made orally or in writing by any person, that is inconsistent with any statement made orally or in writing by any witness the government anticipates calling at the hearing.

In this regard, I am particularly interested in whether any witnesses whom you have interviewed have said things that are inconsistent with the reports of Agent Rudnicki which you have furnished me, or with the testimony of agent Rudnicki at the grand jury on January 5, 2005 and at the detention hearing on February 4, 2005.

- b. Any information that would cast doubt on the admissibility of evidence – such as the firearm seized from Mr. Wright.
- c. A written description of any prosecutable federal offense known by the government to have been committed by any witness whom the government anticipates calling at the suppression hearing.
- d. A written description of any conduct known to the government that may be admissible under Fed. R. Evid. 608(b) known by the government to have been committed by a witness whom the government anticipates calling at the suppression hearing.

- e. Any inconsistent statement, or a description of such a statement, made orally or in writing by any witness whom the government anticipates calling at the hearing.
- f. Finally, on March 16 I submitted a Henshaw request to you seeking disclosure of possible misconduct by Boston Police Officers. You responded on March 31, agreeing to provide certain information if it exists. I would like to know prior to the hearing whether there is any such information, and to the extent that there is, what the information is.

Sincerely,

/s/

Charles W. Rankin

cc: Clerk, U.S. District Court